



August 31, 2010

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 02-60
COMMENT SOUGHT ON REQUEST TO PERMANENTLY GRANDFATHER RURAL
HEALTH CARE PROVIDERS THAT RECEIVED FUNDING COMMITMENT PRIOR TO
JULY 1, 2005 SO THAT THEY WILL REMAIN ELIGIBLE FOR UNIVERSAL SERVICE
SUPPORT

Dear Ms. Dortch,

On August 13, 2010, the FCC released a public notice seeking comment regarding the petition filed by the Nebraska Public Service Commission to permanently grandfather rural health care providers that would not be eligible for universal service support after June 30, 2011, absent Commission action. The Board of Directors of Valley County Health System would like to take this opportunity to provide comment and we thank you for the opportunity to do so.

Valley County Health System is a member of the NSTN and, as an endpoint for Good Samaritan Hospital; our hospital would be directly affected if the backbone lines originating at this hub site were disconnected, leaving our hospital without access to the rest of the state via telehealth.

Valley County Health System is located in Ord, Nebraska population 2,200. We have 25 licensed beds and have a service area of 12,300. As with most rural communities, our population is older than the national average with our hospital patient census being 53.1% Medicare. We are located 75 miles from the nearest tertiary care center providing specialty services and serve a county that is considered both medically underserved and a Mental Health Professional Shortage area.

Telehealth provides our patients with tele-trauma services, psychiatric consults, physician consults. In addition, our staff includes 2 of primary care physicians and 4 mid-level practitioners. These individuals have a call schedule of 1 weekend per month and one night per week. Having access to education and training via telehealth allows these individuals to remain in the community where they are needed to care for patients while still receiving important continuing education credits.

As stated earlier, Valley County Health System is located 75 miles from the closest large hospital facility or community college. The tele health connectivity allows for much more physically efficient and economically feasible training than having staff drive to available training. Also to consider are Nebraska's sometimes harsh winters. The ability for staff to remain safe here in our hospital and train or consult via tele-connectivity can truly be considered a life saver.

The NSTN exists to serve rural communities like Ord, Nebraska. The majority of the interactions that take place via the NSTN benefit small rural health care providers and those for whom we provide care. Should it be disbanded, these communities will be the ones most affected. The technological set up of this Network is designed to provide maximum support to its members, serve as a best technological practice and save costs while allowing all hospitals and health departments in the state to be connected via a comprehensive, statewide, dedicated videoconferencing network.

Valley County Health System supports the Nebraska Public Service Commission's petition and respectfully requests that the FCC universally grandfather all currently eligible rural sites regardless of geography and population with no end-date.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Joyce Seward". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Joyce Seward
Interim CEO